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 2-WAY COMPUTING INC.

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

2-WAY COMPUTING, INC., a Nevada  
 corporation,

Plaintiff,

vs.

CISCO SYSTEMS, INC., a California  
 corporation,

Defendant.

Case No.: **2:15-cv-02235-GMN-CWH**

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND DEADLINE TO  
 FILE PROPOSED PROTECTIVE  
 ORDER**

**(Second Request)**

Plaintiff 2-Way Computing, Inc. (“2-Way” or “Plaintiff”) and Cisco Systems, Inc.  
 (“Cisco” or “Defendant”) by and through their counsel, hereby file this Stipulation and

[Proposed] Order to Extend the Deadline to File Proposed Protective Order. This request is filed in compliance with LR IA 6-1, LR IA 6-2, and LR 7-1. The litigation of this matter will be best served by the proposed extension. This is the second request to extend this deadline. This request is not made after the deadline which is currently May 11, 2016.

On April 22, 2016, the Court entered the Discovery Plan and Scheduling Order in this matter, ECF No. 35, setting April 27, 2016 as the deadline for the parties to file a proposed protective order. On April 27, 2016, the parties submitted a stipulation for a two-week extension of the proposed protective order deadline to May 11, 2016, ECF No. 36, which the Court approved on April 28, 2016, ECF No. 37. The parties have made substantial progress toward an agreed protective order during that two-week period, but agree that an additional one-week extension, to May 18, 2016, will permit the parties time to resolve a few remaining issues so that the parties can present a minimal number of disputes, if any, regarding the proposed protective order to the Court.

Accordingly, Plaintiff and Defendant respectfully request that the Court grant this request to continue the deadline to file a proposed protective order until May 18, 2016.

Dated: May 11, 2016

Respectfully submitted,

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Counsel for Defendant

**ORDER**

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: May 12, 2016

**CERTIFICATE OF SERVICE**

I am a resident of Clark County, Nevada and am over the age of 18 years and not a party to the action. My business address is: 10161 Park Run Drive, Suite 150, Las Vegas, Nevada, 89145.

On **May 11, 2016**, I served this document on the parties listed on the attached service list via one or more of the methods of service described below as indicated next to the name of the served individual or entity by a checked box:

**PERSONAL SERVICE:** by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

**EMAIL:** By transmitting a copy of the document to the electronic-mail address designated by the attorney or the party who has consented to such manner of service.

**E-FILE:** Automatically through the court's electronic filing system.

**FAX SERVICE:** by transmitting to a facsimile machine maintained by the attorney or the party who has consented to such manner of service.

**MAIL SERVICE:** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada. I am readily familiar with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

I declare that under penalty of perjury under the laws of the State of Nevada that the above is true and correct. I further declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

*/s/ Mark Borghese*

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An employee of BORGHESE LEGAL, LTD.

**SERVICE LIST**

ATTORNEYS OF RECORD	PARTIES REPRESENTED	METHOD OF SERVICE
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